

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

IN RE: Keel Ann Edwards

Debtor(s).

)  
) Chapter 7  
)  
) Case No.: 18-07316-JMC-7  
)  
) James M. Carr

**DEBTOR'S MOTION TO REOPEN CASE IN ORDER TO SET ASIDE A  
NOTICE OF NO DISCHARGE**

The Debtor, by and through counsel, the Geraci Law L.L.C., respectfully requests the Court allow the debtor to reopen her Chapter 7 Bankruptcy case so that she may file a Financial Management Course Certificate proving compliance with the instructional course requirement for discharge. In support of her Motion, the debtor submits the following:

- (1) The Debtor(s) filed for relief under Chapter 7 of the U.S. Bankruptcy Code on 09/24/2018.
- (2) The Debtor seeks to have the Court reopen her bankruptcy case so that she may file the Financial Management Course Certificate and receive a discharge of her debts.
- (3) The Financial Management Course Certificate and required statement of completion will be contemporaneously filed with this motion.

WHEREFORE, the Debtor prays the Court reopen her Chapter 7 Bankruptcy case to afford relief to the debtor pursuant to 11 U.S.C. §350(b) and for the purpose of allowing the Debtor to file the Financial Management Course Certificate.

Dated this Friday, July 19, 2019.

Respectfully submitted,

By: /s/ Anthony David Shull  
Anthony David Shull  
55 E. Monroe, #3400  
Chicago, IL 60603  
Phone: (312) 332-1800  
Fax: (877) 247-1960  
E-mail: inn@geracilaw.com

**CERTIFICATE OF SERVICE**

The undersigned, an Attorney, does hereby certify that a copy of this Certificate of Service and a copy of the attached Debtors Motion to Reopen Case In Order To Set Aside A Notice of No Discharge were mailed First Class to the persons mentioned below, at their respective addresses, postage prepaid, by placing a copy in the U.S. Mail on Friday, July 19, 2019:

Keel Edwards  
4865 Richland Dr  
Columbus, OH 43230

Additionally, the documents referenced above were also served via electronic means on the following individuals on Friday, July 19, 2019:

United States Trustee  
Southern District of Indiana  
101 W. Ohio St., Ste. 1000  
Indianapolis, IN 46204

Gregory S. Fehribach  
Stark, Doninger & Smith  
50 S. Meridian St. #700  
Indianapolis, IN 46204

Dated this Friday, July 19, 2019.

By: /s/ Anthony David Shull  
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